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16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 NAVAJO HEALTH FOUNDATION – SAGE
19 MEMORIAL HOSPITAL, INC. (doing
business as “Sage Memorial Hospital”); an
20 Arizona non-profit corporation,

21 Plaintiff,

Case No. 2:19-cv-0329-GMN-EJY

22 vs.

23 RAZAGHI DEVELOPMENT COMPANY,
24 LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
25 AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

**JOINT STIPULATION TO EXTEND
TIME FOR PLAINTIFF TO FILE AN
AMENDED COMPLAINT**

(FIRST REQUEST)

27 Defendants.
28

1 Pursuant to Federal Rule of Civil Procedure 6(b)(1) and the Court's Local Rule of Civil
2 Practice 7-2, Plaintiff (Navajo Health Foundation – Sage Memorial Hospital, Inc.) and
3 Defendants (Razaghi Development Company, LLC, Ahmad Razaghi and Tausif Hasan)
4 stipulate and agree to permit Plaintiff an additional 30-days, or to and until May 5, 2021, to file
5 an Amended Complaint. This is the parties first request for an extension of time for the purpose
6 set forth herein. The parties respectfully request the Court approve this stipulation and in
7 support of this request rely upon the following facts:
8

9 1. By Order filed March 15, 2021 the Court permitted Plaintiff to file “an Amended
10 Complaint curing the deficiencies” identified in its 34-page Order. *See ECF 128, p. 34.*
11 Currently, Plaintiff’s Amended Complaint is due on or before April 5, 2021.
12

13 2. Counsel for Plaintiff has communicated with defense counsel regarding this matter
14 and expressed the need for additional time in order address the deficiencies identified by the
15 Court while at the same time balancing competing case commitments. Further, counsel for
16 Plaintiff will need this additional time to verify certain facts for inclusion in the Amended
17 Complaint. All of the foregoing will require additional time beyond the current deadline.
18

19 3. Counsel for Defendants do not have any issue with Plaintiff being granted an
20 additional 30-days, or until May 5, 2021, to file an Amended Complaint. The parties agree that
21 good cause supports this request.
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1 In light of the foregoing, the parties respectfully request that the Court approve this
2 stipulation.

3

4 /s/ Kris Leonhardt

5

6 Pavneet S. Uppal, Esq.
7 Kris Leonhardt, Esq.
8 Brian L. Bradford, Esq

9 *Counsel for all named Defendants*

10 Dated: March 31, 2021

11

12 /s/ Paul S. Padda

13 Kathleen Bliss, Esq.
14 Paul S. Padda, Esq.
15 David Stander, Esq.
16 Douglass A. Mitchell, Esq.

17 *Counsel for Christi El-Meligi,
18 Netrisha Dalgai and Navajo Health
19 Foundation – Sage Memorial
20 Hospital, Inc.*

21 Dated: March 31, 2020

22

23 **IT IS SO ORDERED:**

24

25 
26 UNITED STATES MAGISTRATE JUDGE

27

28 **DATED: March 31, 2021**